

2 PENELOPE A. PREOVOLOS (CA SBN 87607)
3 (PPreovolos@mofo.com)
4 ANDREW D. MUHLBACH (CA SBN 175694)
(AMuhlbach@mofo.com)
5 ALEXEI KLESTOFF (CA SBN 224016)
(AKlestoff@mofo.com)
6 MORRISON & FOERSTER LLP
7 425 Market Street
8 San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

9
10 *Attorneys for Defendant*
11 APPLE INC.

FILED

JUN 29 2012

RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12
13
14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION
18
19

20
21
22
23
24
25
26
27
28 IN RE APPLE IPHONE 4 PRODUCTS
LIABILITY LITIGATION

Case No. 5:10-md-02188-RMW

**DECLARATION OF PENELOPE A.
PREOVOLOS IN OPPOSITION TO
OBJECTIONS TO PROPOSED
SETTLEMENT**

60
Date: July 13, 2012
Time: 9:00 a.m.
Place: Courtroom 6
The Honorable Ronald Whyte

DECL. P. PREOVOLOS IN OPPOSITION TO OBJECTIONS TO PROPOSED SETTLEMENT
CASE NO. 5:10-md-02188-RMW

1 I, PENELOPE A. PREOVOLOS, declare and state:

2 1. I am a member of the Bar of the State of California and a partner in the law firm of
3 Morrison & Foerster LLP, attorneys of record for defendant Apple Inc. ("Apple"), in the above-
4 captioned action. I have personal knowledge of the matters set forth below and, if called upon to do
5 so, I could and would competently testify thereto.

6 2. Attached hereto as Exhibit A is a true and correct copy of Class Member Michael
7 Karlesky's objection to the proposed Class Settlement.

8 3. Attached hereto as Exhibit B is a true and correct copy of Class Member Jordan D.
9 Maglich, Esq.'s objection to the proposed Class Settlement.

10 4. Attached hereto as Exhibit C is a true and correct copy of Joseph Darrell Palmer's
11 objection to the proposed Class Settlement, filed on behalf of Class Member Alison Paul.

12 5. Attached hereto as Exhibit D is a true and correct copy of Joseph Darrell Palmer's
13 objection to the settlement in *In re Magsafe Apple Power Adapter Litigation*, Case No. 5:09-CV-
14 01911-JW (N.D. Cal.) ("In re MagSafe").

15 6. Attached hereto as Exhibit E is a true and correct copy of Joseph Darrell Palmer's
16 objection to the settlement in *Johnson v. Apple Inc*, Case No. 1-09-cv-146501, (Santa Clara Super.
17 Ct.) ("Johnson").

18 7. Attached hereto as Exhibit F is a true and correct copy of the March 8, 2012 order
19 granting final approval of the settlement in *In re Magsafe*.

20 8. Attached hereto as Exhibit G is a true and correct copy of the April 18, 2012 final
21 judgment and order approving the settlement in *Johnson*.

22 9. Attached hereto as Exhibit H is a true and correct copy of Thomas L. Cox, Jr.'s objection
23 to the proposed Class Settlement, filed on behalf of Class Members Frank Aldridge, John Davis,
24 Jenny Dowdy, Larry Lavine, Paige Nash, Katie Sibley, Warren Sibley, and David Stevens.

25 10. Attached hereto as Exhibit I is a true and correct copy of Thomas L. Cox, Jr.'s objection
26 to the settlement in *In re MagSafe*.

27 11. Attached hereto as Exhibit J is a true and correct copy of Class Member Bert Chapa's
28 objection to the proposed Class Settlement.

12. Attached hereto as Exhibit K is a true and correct copy of Class Member Michael J. Schulz's objection to the proposed Class Settlement.

13. Attached hereto as Exhibit L is a true and correct copy of Class Member Burke Fort's objection to the proposed Class Settlement.

14. Attached hereto as Exhibit M is a true and correct copy of Class Member Karabeth Bigford's objection to the proposed Class Settlement.

15. Attached hereto as Exhibit N is a true and correct copy of Class Member Brittany Davis's objection to the proposed Class Settlement.

16. Attached hereto as Exhibit O is a true and correct copy of Class Member Charles Farnum's objection to the proposed Class Settlement.

17. Attached hereto as Exhibit P is a true and correct copy of Class Member Tonia Johnson's objection to the proposed Class Settlement.

18. Attached hereto as Exhibit Q is a true and correct copy of Class Member Gregg Salomon's objection to the proposed Class Settlement.

19. Attached hereto as Exhibit R is a true and correct copy of Class Member Wesley Sullivant's objection to the proposed Class Settlement.

20. Attached hereto as Exhibit S is a true and correct copy of Class Member Abhishek Tripathi's objection to the proposed Class Settlement.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct.

Executed on June 29, 2012 at San Francisco, California.

Penelope Preovolos
Penelope A. Preovolos